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PRO-SHORE, LLC, BUILD GROUP, INC.
and PACIFIC STRUCTURES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PRO-SHORE, LLC; BUILD GROUP, INC.;)	Case No.: 17-cv-05295 (EMC)
and PACIFIC STRUCTURES, INC.,)	
)	
Plaintiffs,)	STIPULATION AND ORDER TO
)	EXTEND THE DEADLINE TO FILE
)	SECOND AMENDED COMPLAINT
v.)	
)	
)	
DAYTON SUPERIOR CORPORATION,)	
)	
Defendant.)	
)	

1 On March 27, 2018, Plaintiffs Pro-Shore, LLC, Build Group, Inc. and Pacific Structures,
2 Inc. and Defendant Dayton Superior Corporation and (collectively, the “Parties”) filed a Stipulation
3 and Order to continue the March 28, 2018 deadline date for plaintiff Pro-Shore, LLC to file a
4 second amended complaint to April 27, 2018. The Court has not yet entered that order.

5 Previously, on March 23, 2018, the Court rescheduled the dates for the Parties’ Joint Case
6 Management Statement and the May 3, 2018 Initial Case Management Conference. The Parties’
7 Joint Case Management Statement is now due on May 24, 2018 and the Initial Case Management
8 Conference is currently scheduled for May 31, 2018 at 9:30 a.m. The Parties agreed to exchange
9 their initial disclosures on the same day the Joint Case Management Statement is due, May 24,
10 2018.

11 The Parties hereby stipulate to continue the presumptive April 27, 2018 deadline date for
12 plaintiff Pro-Shore, LLC to file a second amended complaint to May 31, 2018. The Parties are
13 optimistic that they will be able to resolve their disputes without further Court intervention and the
14 additional time will enable the Parties to meet this goal. The Parties are continuing their settlement
15 discussions and are in the process of negotiating potential settlement documents.

16 Pursuant to the Court’s CMC Order, the Parties, through their respective counsel, stipulate
17 that the date for plaintiff Pro-Shore, LLC to file a second amended complaint be continued to May
18 31, 2018.

19
20 **IT IS SO STIPULATED.**

21 Dated: May 9, 2018

22 By: /s/ Todd A. Noah

23 Todd A. Noah (SBN 152328)

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9 PRO-SHORE, LLC, BUILD GROUP,
10 INC. AND PACIFIC STRUCTURES,
11 INC.

12 Dated: May 9, 2018

13 By: /s/ Katherine D. Prescott
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Attorneys for Defendant,
DAYTON SUPERIOR CORPORATION

1 I attest under penalty of perjury that concurrence in the filing of this document has been
2 obtained from Katherine D. Prescott.

3 _____
4 /s/ Todd A. Noah

5 PURSUANT TO STIPULATION, IT IS SO ORDERED:
6

7
8 Dated: May ¹⁴____, 2018

